



NOTICE OF SPCC INSPECTION
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6

Date: 1/5/2016	Lead Inspector (Print Name & Sign): Tom McKay [Signature]	Inspection Number: SPCC-OK-2016-00039
Additional Inspectors:		
Facility Name: Hughes Tank Bottoms	Facility Address: 650 County Road 75	Facility Type: Onshore Oil Production
Facility Phone: 705-295-2150	Facility Email: tom.chernick@newdow.com	Facility Fax: N/A
<p>The purpose of today's inspection is to determine compliance with Section 311 of the Clean Water Act (the "Act"), 33 U.S.C. § 1321, and the Oil Pollution Prevention regulations found at 40 C.F.R. Part 112 (the "Regulations"). The scope of the inspection and plan review process may include, but is not limited to, reviewing and obtaining copies of documents and records; interviewing facility personnel; a physical inspection of the facility (including process areas); taking photographs or video; collecting samples; and other activities necessary to determine compliance with the Act and the regulations.</p> <p>Please review this Notice of SPCC Inspection ("Notice") carefully. Note that any deficiencies identified by the inspector and communicated to you during the closing conference are the inspector's observations and not a determination of compliance.</p> <p>Please be advised that any noncompliance with the Regulations may constitute a violation under the Act for which penalties or other relief may be sought. Penalties may be assessed upon subsequent findings by the Administrator or a court that the facility has violated the Act and/or the regulations. The United States Environmental Protection Agency ("EPA") reserves its right to initiate an enforcement action under the Act and any other applicable law, to seek penalties and other appropriate relief, for any violation of the Act, the Regulations, or such other laws. This Notice and other relevant information will be reviewed by appropriate EPA personnel to determine if any deficiencies, identified in such review, constitute violations of the Act and the Regulations and whether an enforcement action is appropriate. EPA will provide written correspondence describing any deficiencies identified during the inspection.</p> <p>If deficiencies with the Regulations were identified during the inspection and communicated to you during the closing conference you are urged to correct such deficiencies as soon as possible. EPA requests you submit all information, as soon as possible, evidencing your correction of the deficiencies to:</p> <p style="text-align: center;">Inspector Tom McKay U.S. Environmental Protection Agency - Region 6 (6SF-PO) 1445 Ross Avenue, Dallas, TX 75202</p> <p>If it is not feasible to correct the deficiencies within 30 days of the date of the inspection, immediately submit a detailed explanation and schedule indicating by when the noted deficiencies will be corrected. If you believe that your facility is not required to have an SPCC Plan, or is in compliance with the SPCC regulatory requirements, submit an explanation, supported by documentation, as to why the facility is not subject to the SPCC provision of the Oil Pollution Prevention regulations at 40 C.F.R. Part 112 or meets its requirements within 30 days of the date of the inspection.</p> <p style="text-align: center;">Confidential Business Information</p> <p>For the information submitted to EPA, you may be entitled to claim it as Confidential Business Information (CBI) pursuant to the regulations set forth in 40 C.F.R. Part 2. If EPA determines the information you have designated meets the criteria in 40 C.F.R. § 2.208, the information will be disclosed only to the extent and by means of the procedures specified in 40 C.F.R. Part 2 Subpart B. Unless CBI is claimed, EPA may make the information available to the public without further notice to you.</p>		
Acknowledgement of Inspection		
<p>Signature of Facility Representative: [Signature] 1-5-2016 THOMAS CHERNICKY</p> <p>Title of Facility Representative: NEW DOWIDION, LLC EHS REP.</p>		

R6-OK-01236